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BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Into Implementation of Federal Communications Commission Report and Order 04-87, As It Affects The Universal Lifeline Telephone Service Program	Rulemaking 04-12-001 **Phase 2**

VERIZON CALIFORNIA INC. (U 1002 C) OPENING COMMENTS ON LIFELINE CERTIFICATION PROCESS

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INTRODUCTION

These comments are submitted in response to the Assigned Commissioner's Ruling Setting Scope of Phase 2 (the ACR). The ACR requests comments on whether the Commission should change the current system of allowing customers to obtain Lifeline immediately, subject to subsequent verification of eligibility, to one where the customer is not enrolled in Lifeline until eligibility based on income or participation in a qualified public assistance program is verified. Verizon supports pre-qualification because of the many benefits we discuss below.

The ACR also asks whether the Commission should eliminate the option of proving eligibility based on income and instead use participation in a public assistance program as the only criterion for Lifeline eligibility. Verizon supports the elimination of income eligibility for a variety of reasons, chief among them that it simplifies administration and reduces the burden placed on the fund by administrative costs.

Finally, the ACR also asks whether the Commission can coordinate Lifeline with Commission low-income programs for energy and water in a way that allows a California resident to apply for and obtain all programs with just one application. Because the low-income programs for energy and water allow the customer to self-certify that they are income eligible, participation in those programs as presently constituted cannot be used to qualify for Lifeline because the Federal Communications Commission (FCC) prohibits self-certification of income.

DISCUSSION

I. THE COMMISSION SHOULD ABANDON THE CURRENT SYSTEM IN FAVOR OF ONE WHERE CUSTOMERS ARE PRE-QUALIFIED PRIOR TO RECEIVING LIFELINE DISCOUNTS

The Commission should simplify the Lifeline certification process through pre-qualification[1] because doing so provides a number of benefits. First, administration of the program becomes easier thereby reducing the costs of the program. Costs will be reduced because a substantial number of customers — those that sign on to Lifeline and are later found to be ineligible — would no longer have to be processed.

Second, pre-qualification will reduce the burdens on Lifeline applicants that do not qualify. Previously, California Lifeline customers received the discounted phone rate when they initiated phone service by self-certifying income eligibility.[2] Since the certification process has changed and customers are now required to prove eligibility, customers rejected from the Lifeline program are required to repay the discounted rates, a higher connection fee, and other federal and state taxes and surcharges. If the process of rejection takes several months, as often occurs, customers may be backbilled substantially more than $100.00.[3]

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[1] Under a pre-qualification system, discounted rates would not be granted upon service initiation. Instead, the customer is charged the full residential rate and once the customer's eligibility in the program is certified, she is then placed on the Lifeline program and given a credit for the difference between the full residential rate and the Lifeline rate for the period between service initiation and certification.

[2] *Report on Strategies to Improve the California Lifeline Certification and Verification Processes*, prepared by the Staff of the Communications Division (rel. April 2, 2007) ("Staff Report") at 32.

[3] General Order 153, Section 5.4.4 requires carriers to collect discounted amounts from customers ineligible for Lifeline service: "Any customer who fails to qualify for ULTS by the certification date shall be removed from the ULTS program and converted to regular service. Upon notification from the CertA, the utility shall bill the customer for all ULTS discounts received by the customer, including all previously waived or discounted charges, service initiation charges,

Commission Staff reports that many applicants who are ultimately deemed ineligible for Lifeline discounts only marginally exceed Lifeline income thresholds.[4] Thus, they are likely to face significant burden as a result of backbilling.

This problem was exacerbated by the changes adopted in D.07-05-030 to give customers more time related to certifications. The Decision took the following actions with regard to certification form return and review:

- Delayed the customer reminder from the Third Party Administrator to return forms by seven days to offset mailing delays;
- Increased the timeframe for new customers to return certification forms from 30 to 44 days;
- Added an eight-day grace period for the late receipt of certification forms.

While these actions provide new customers additional time to return certification forms, customers found ineligible face backbilling for a significantly longer period of time and face large billing regrades. Because more than 50% of new Verizon customers do not return a certification form or are found ineligible upon submitting one, a significant number of customers experience larger than expected bills as previous Lifeline-related discounts are reversed. This also increases customer call volume and duration, as well as inquiries and/or written appeals to Verizon and the Commission's Consumer Affairs Branch ("CAB").

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end user common line charges, taxes, and surcharges associated with ULTS discounts." D.07-05-030 at 13 clarified that the 90-day backbilling limitations in carrier tariffs do not apply to collecting discounts given to ineligible Lifeline applicants. *Cf.* Verizon California Inc. Schedule Cal. P.U.C. No. D&R Rule No. 10(J) (allowing Verizon to backbill up to three months: "a bill shall not include any previously unbilled charge, commonly called 'backbilling', for service furnished prior to three months immediately preceding the date of the bill.").

[4] *Staff Report* at 32.

Indeed, prior to the July 2006 changes in certification, most inquiries and complaints from Lifeline customers related to backbilling for those found ineligible. All of these problems and the associated delays, customer inconvenience and cost can largely be eliminated by adopting a customer pre-qualification system.

Third, pre-qualification system gives customers an incentive to avoid delays in submitting certification documents in order to receive the Lifeline discounts expeditiously. Thus, customer-caused delays in processing Lifeline applications are likely to diminish.

Fourth, if the Commission chooses to retain income-based eligibility — and as discussed below, it should not — moving to pre-qualification will bring the Commission into full compliance with the FCC's Lifeline Order. Under the FCC Lifeline Order,[5] customers must present documentation to prove income eligibility before enrollment.[6] Specifically, 47 CFR § 54.410 provides that: "Consumers qualifying under an income-based criterion must present documentation of their household income ***prior to enrollment*** in Lifeline." Currently, customers asking for Lifeline service are enrolled on first contact. No process exists to wait for the customer to actually "present" income documentation prior to enrollment, and thus the Commission's program does not fully comply with FCC rules. The FCC does not allow enrollment prior to qualification and the Commission can come into full compliance with the FCC order by moving to pre-qualification.

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5 FCC 04-87 (*rel*. April 2, 2004).

6 *Id*. at ¶ 37.

Finally, moving to a system of pre-qualification will not burden most low-income customers because the Affordability Study, previously performed under the New Regulatory Framework,[7] demonstrates that most Lifeline subscribers (and by implication ineligible Lifeline applicants) can afford service initiation charges. "The mean monthly bill size (all lines combined) is reported to be $90 for those finding service 'difficult' to afford versus $73 for those saying 'somewhat easy' and $60 for those saying 'very easy.'"[8] Lifeline subscribers have average monthly bills of $49 and nearly 67% of Lifeline households also pay an additional $70 a month on cell phone service.[9] It follows that if most Lifeline subscribers can afford both $49 in phone costs and an additional $70 a month for cell phone service, the ineligible Lifeline applicant can afford to pay typical installation costs. Those who cannot afford the installation charges can avail themselves of a three-month installment payment plan for connection fees, as provided for in Verizon Tariff Rule 10, Section I.

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7 The study surveyed over 5000 customers and "non-customers" (households that had recently terminated service). The study's objectives were: (1) to explore the affordability of telephone service among California households and its effect on subscription to telephone service, (2) to provide an understanding of the characteristics of non-customers and their reasons for not having basic telephone service, and (3) to provide an understanding of low-income customers, customers in major ethnic subgroups and those most at risk of losing phone service. The Field Research Corporation performed the survey and research between October 2003 and March 2004 on behalf of Verizon CA and AT&T. It documented the study in four volumes: (a) 2004 Affordability Study: Summary Presentation to the California Public Utilities Commission, July 26, 2004 ("Summary Presentation"), (b) Affordability of Telephone Service, Volume 1: 2004 Customer Survey ("Customer Survey"), (c) Affordability of Telephone Service, Volume 2: 2004 Non-Customer Survey ("Non-Customer Survey") and (d) Volume 3, Technical Appendix. Verizon CA refers to the four volumes collectively as the "Affordability Study."

8 *Id*.

9 *Id*. at 58.

As the Staff Report recognizes, other states follow the pre-qualification system.[10] In the State of Washington all Lifeline recipients are pre-qualified; that is, income eligibility is verified prior to program enrollment. But in the spirit of simplifying the program to minimize costs, Verizon supports that ACR's move toward a system of using enrollment in a qualified government assistance program as the sole criterion for qualification, discussed below.

II. THE COMMISSION SHOULD ELIMINATE INCOME ELIGIBILITY AND MOVE TOWARD QUALIFIED ASSISTANCE PROGRAM-BASED ELIGIBILITY

The Commission should move to a system under which customers can qualify for Lifeline based on the sole criterion of enrollment in a qualified government public assistance program listed in 47 C.F.R. § 54.409(b).[11] Moving to this type of program will promote the goal of administrative simplicity by expediting processing of certifications, as the FCC and the Commission allow applicants to self-certify participation in a qualified government assistance program.

Moving to this type of a system will eventually also save funds paid to the Third Party Administrator (TPA)[12] as it would eliminate the need to require customers to provide proof of eligibility based on income.[13] As the Commission

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10 *See* Staff Report at 45.

11 Section 54.409(b) lists the following programs: Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance (Section 8), Low-Income Home Energy Assistance Program, National School Lunch Program's free lunch program or Temporary Assistance for Needy Families.

12 Because the Commission has a contract with Solix, Inc. to be the TPA, these savings would accrue after renegotiation of that contract.

13 In D.05-04-026, the Commission adopted income-based certification and listed the documents acceptable to show income. See D.05-04-026 at 10-11 (concluding that "We will adopt the list developed by that FCC").

acknowledged in D.05-04-026, "program-based eligibility is much less labor-intensive than the income certification process in which TPA employees need to review and approve the income documentation submitted by the customer." D.05-04-026 at 16. It will reduce TPA costs and simplify the process because TPA staff will no longer need to review income documentation and make decisions about eligibility, which sometimes may require mathematical calculations. This is an important goal because ultimately customers pay for these increased costs through higher end user surcharges. Moreover, in R.06-05-028, the Commission is considering expanding the Lifeline program to wireless and other intermodal carriers. If the Commission does so, these administrative costs are likely to increase, as the TPA will have the additional burden of ensuring that Lifeline customers use only one service.

Eliminating income-eligibility will also allow the Commission to minimize the impact on the fund caused by reimbursing carriers for bad debt. In D.05-12-013, the Commission revised the bad debt section of GO 153 based on the following reasoning:

> We believe that we should not order the carriers to sign customers up for ULTS at initial contact, unless we take steps to see that they are made whole in the case of default by the customer. We have done that by revising the bad debt section (§ 5.4.4 of the GO), as recommended by the Small LECs and SureWest. The ULTS fund will be financially responsible for bad debt incurred through the initial certification process, ***including bad debt incurred from the federal Lifeline and Link-Up programs***. In that manner, the federal program will be reimbursed for any Link-Up or Lifeline funds expended for customers who are deemed ineligible for the program through the initial certification process.

In other words, in order to allow first contact enrollment without having to wait for income verification, the Commission took on the obligation to refund not only the carrier, but the federal fund too. By moving to program-based only eligibility, the Commission can avoid this “bad debt” cost.

In addition, residents who have no proof of income benefit from a program-based system. D.05-04-026 recounts comments by Latino Issues Forum (LIF), The Utility Reform Network (“TURN”), Blue Casa, La Curacao and the Greenlining Institute, who all point out that many low-income people, particularly undocumented immigrants, live in a cash economy and have no proof of income. LIF asserts that many employers pay day workers, gardeners and domestic workers in cash, and thus, the workers have no payroll stubs, social security records or other paperwork. Other immigrants come from countries where they have a basic distrust of the government and would be unwilling to supply personal income information to the phone company, which in many countries is a government entity. D.05-04-026 at 12-13.

The Commission concluded that it would add the National School Lunch (NSL) Free Lunch program, Women, Infants and Children (WIC) and Healthy Families Category A, in an effort to provide methods for undocumented persons and those who are part of the cash economy and have no way to document their income, to be eligible for the Lifeline program.

Verizon agrees with the Assigned Commissioner that moving toward eligibility based solely on enrollment in a government assistance program will not only eliminate the burdens of providing income documentation, but would help those that live in a cash economy.

III. THE COMMISSION CANNOT COORDINATE ENROLLMENT WITH OTHER COMMISSION LOW-INCOME PROGRAMS BECAUSE THESE PROGRAMS ALLOW SELF-CERTIFICATION OF INCOME ELIGIBILITY

The ACR asks the parties to comment on whether there is a way for a customer to sign up for all low-income programs administered by the Commission, including Lifeline, CARE, LIEE, and Water low income programs, by using just one form. Doing so would require changes to the energy and water programs to harmonize their eligibility with the more restrictive FCC rule prohibiting self-certification of income eligibility. The Commission could eliminate income-eligibility across the board and provide that a customer who is enrolled in a qualified public assistance program is eligible for all Commission low-income programs and create the necessary pre-qualification process to ensure one certification is acceptable by all programs.

What it cannot do is make customers eligible for Lifeline by reference to a low-income program that allows self-certification of eligibility. As discussed above, "the FCC specifically eliminates self-certification as an acceptable method of certification" of Lifeline eligibility based on income. D.05-04-026 at 8. All of the other Commission low-income programs allow self-certification of income eligibility. The California Alternate Rates for Energy (CARE) Program, the Low Income Energy Efficiency (LIEE) program and the Low-Income Ratepayer Assistance (LIRA) water programs, are all based on self-certification of income. Because the low-income programs for energy and water allow customers to self-certify income eligibility, the Commission cannot allow enrollment in CARE, LIEE or in a water LIRA program to be an acceptable program for enrollment in Lifeline service.

CONCLUSION

For the foregoing reasons, Verizon supports moving to a system where customers are pre-qualified prior to Lifeline enrollment, eliminating income eligibility and moving to a system where the sole criterion for qualification is participation in a qualified public assistance program. The Commission, however, cannot use participation in the energy or water low-income programs as a qualified public assistance program because those programs allow self-certification of income and the FCC prohibits self-certification of income eligibility for Lifeline.

Dated: December 14, 2007

Respectfully submitted,

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<u>**CERTIFICATE OF SERVICE**</u>

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 112 Lakeview Canyon Road, CA501LB, Thousand Oaks, California 91362; I have this day served a copy of the foregoing, **VERIZON CALIFORNIA INC. (U 1002 C) OPENING COMMENTS ON LIFELINE CERTIFICATION PROCESS** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of December, 2007 at Thousand Oaks, California.

/s/
JACQUE LOPEZ

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